

**UNITED STATES DISTRICT COURT  
for the  
SOUTHERN DISTRICT OF NEW YORK**

**JEANINE P. COHEN,**  
**Plaintiff,**

**Case No. 7:22 –cv-07182 (VB)**

**v.**

**WESTLAKE FLOORING  
SERVICES, INC., et al.,  
Defendants.**

**January 6, 2023**

**AFFIDAVIT OF MEGAN FELDMETH**

I, Megan Feldmeth, hereby depose and state under oath as follows:

1. I am over eighteen years of age and believe in the obligation of an oath.
2. I have been employed by Westlake Financial Services and related entities in Human Resources related capacities since 2018. I have held the position of Director of Human Resources since February 1, 2021.
3. In connection with my job duties, I have personal knowledge of Westlake's on-boarding process for new hires.
4. As part of its on-boarding process, Westlake requires all new employees to sign a variety of forms. They include government required forms, such as I-9s and W-4s, as well as several company required acknowledgements and agreements. The company required documents include, but are not limited to a Phone and Internet Monitoring agreement, a Meal Rest Break and Time Card Policy agreement, an Employee Confidentiality Agreement, an Information Access Security Agreement, and a Notice to Employee addressing wages, Workers' Compensation, and paid sick leave, and an Employer – Employee Dispute Resolution

Agreement. All employees are expected to sign copies of these agreements at the commencement of their employment, which are maintained in their personnel files.

5. In connection with my job duties, I have access to the personnel files of Westlake employees. In connection with the preparation of this affidavit, I accessed Jeanine Cohen's Westlake personnel file.

6. Attached to Defendants Motion to Compel as Exhibit 1 are true and accurate copies of the Phone and Internet Monitoring agreement, a Meal Rest Break and Time Card Policy agreement, an Employee Confidentiality Agreement, an Information Access Security Agreement, and a Notice to Employee addressing wages, Workers' Compensation, and paid sick leave documents Jeanine Cohen signed at the commencement of her employment on or about May 4, 2015, which are maintained in her Westlake personnel file.

7. Attached to Defendants' Motion to Compel as Exhibit 2 is a true and accurate copy of the Employer – Employee Dispute Resolution Agreement Jeanine Cohen signed at the commencement of her employment on or about May 4, 2015, which are maintained in her Westlake personnel file.



---

Megan Feldmeth

Subscribed and sworn before me this  
6<sup>th</sup> day of January, 2022.

See attached CA Just. (2)

---

Notary Public/Commissioner of the Superior Court

**CALIFORNIA JURAT**

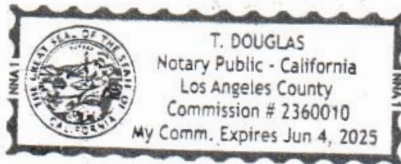
GOVERNMENT CODE § 8202

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles

Subscribed and sworn to (or affirmed) before me on

this 6 day of January, 2023, by  
Date Month Year(1) Megan Feldman(and (2) \_\_\_\_\_),  
Name(s) of Signer(s)proved to me on the basis of satisfactory evidence to  
be the person(s) who appeared before me.

Place Notary Seal and/or Stamp Above

Signature

Signature of Notary Public

**OPTIONAL**

Completing this information can deter alteration of the document or  
fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**Title or Type of Document: Affidavit of Megan FeldmanDocument Date: January 6, 2023 Number of Pages: 2Signer(s) Other Than Named Above: NA